



Certified Mail - Return Receipt Requested

April 19, 1988
PMV 88-134

Mr. Michael Gerchman
Division of Hazardous Waste Management
New Jersey Dept. of Environmental Protection
401 East State St.
CN 028
Trenton, NJ 08625

Subject: S. Plainfield Accumulation Center
Part B Permit Application Revision

Dear Mr. Gerchman:

Enclosed please find one original plus four copies of the revised text for the S. Plainfield Part B permit application. The permit application has been revised to include the waste oil collection service. Also included are analyses of waste oil, a Material Safety Data Sheet and a revised Part A Application.

The Tank Fabrication Details D10570, is applicable to the waste oil tank. The revised permit application will be certified by a professional engineer registered in New Jersey.

A revised Employee List, Employees Functions During an Emergency List, and Emergency Information Sheet, have been enclosed. The CP#1 form will be completed and sent to your office by May 31, 1988.

The requirements of N.J.A.C. 7:26-12.2(e)13 are met by the following maps in Appendix C.

- 1) The General Location Map;
- 2) The revised Topographic Map (1"=100');;
- 3) The Zoning Map;
- 4) The Flood Plain Map;
- 5) The Water System Map
- 6) The Sanitary Sewer Map
- 7) The Wind Rose; and
- 8) The survey by George J. Terwilliger, Jr., a licensed New Jersey land surveyor. A stamped original of this survey has been ordered and will be forwarded to your office upon receipt.

Mr. Michael Gerchman
April 19, 1988
Page 2

If you have any questions, please call me on extension 2550.

Sincerely,

Paula M. Ventura

Paula M. Ventura
Environmental Permit Writer

PMV/dFs

cc: Anthony Consalvo, Br. Mgr. (2-118-04)
B. Jantzen, New York Reg. Mgr.
Accumulation Center Mgr. (2-118-04)
G. Yankala
T. Heaton

1. NAME OF THE FACILITY: S. PLAINFIELD
2. ADDRESS: 1. CITY OR TOWN: MIDDLESEX
2. STATE: NJ
3. ZIP CODE: 07080

3. FACILITY NAME AND ADDRESS: SKYLINE DR.
4. CITY OR TOWN: ELGIN
5. STATE: IL
6. ZIP CODE: 60123

7. PHONE (area code & no.): 312 697 8460
8. PHONE (area code & no.): 312 697 8460

9. NAME OF THE FACILITY: FORE, SCOTT ASSOC. CSL
10. ADDRESS: 777 BIG TIMBER ROAD

11. NAME OF THE FACILITY: SAFETY-KLEEN CORP. (2-118-04)
12. ADDRESS: 777 BIG TIMBER ROAD

13. NAME OF THE FACILITY	14. ADDRESS	15. CITY OR TOWN	16. STATE	17. ZIP CODE	18. PHONE (area code & no.)	19. NAME OF THE FACILITY	20. ADDRESS	21. CITY OR TOWN	22. STATE	23. ZIP CODE	24. PHONE (area code & no.)
X						X					
X						X					
X						X					
X						X					
X						X					
X						X					

Section C of the questionnaire, you must indicate the definition of "solid waste" in the box in the left column. If you answer "yes" in the box in the right column, you must indicate the definition of "solid waste" in the box in the right column.

1. NAME OF THE FACILITY: SAFETY-KLEEN CORP. (2-118-04)
2. ADDRESS: 777 BIG TIMBER ROAD
3. CITY OR TOWN: ELGIN
4. STATE: IL
5. ZIP CODE: 60123
6. PHONE (area code & no.): 312 697 8460
7. NAME OF THE FACILITY: FORE, SCOTT ASSOC. CSL
8. ADDRESS: 777 BIG TIMBER ROAD
9. CITY OR TOWN: ELGIN
10. STATE: IL
11. ZIP CODE: 60123
12. PHONE (area code & no.): 312 697 8460
13. NAME OF THE FACILITY: S. PLAINFIELD
14. ADDRESS: 1. CITY OR TOWN: MIDDLESEX
2. STATE: NJ
3. ZIP CODE: 07080
15. PHONE (area code & no.): 312 697 8460

A. FIRST				B. SECOND			
7	7	3	9	9	7	5	1
(specify) Business Services N.				(specify) Product Wholesalers			
C. THIRD				D. FOURTH			
7	5	0	8	4	7	5	0
(specify) Industrial Machinery & Equipment				(specify) Automotive Parts and Supplies			

VIII. OPERATOR INFORMATION

A. NAME				B. IS THE NAME LISTED IN 12000 VILL-A AND THE 12000 VILL-B?			
SAFETY-KLEEN CORP.				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box: If "Other", specify.)				D. PHONE (area code & no.)			
FEDERAL STATE PRIVATE				3 1 2 6 9 7 8 4 6 0			
E. STREET OR P.O. BOX				F. CITY OR TOWN			
777 BIG TIMBER ROAD				ELGIN			
G. STATE				H. ZIP CODE			
IL				6 0 1 2 3			
I. IS THE FACILITY LOCATED ON INDIAN LAND?				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

IX. EXISTING ENVIRONMENTAL PERMIT

A. PERMIT (Check one)		B. PER (Check one)	
1. AIR	2. WATER	3. AIR	4. WATER
5. OTHER	6. OTHER	7. AIR	8. WATER
9. OTHER	10. OTHER	11. AIR	12. WATER
13. OTHER	14. OTHER	15. AIR	16. WATER
17. OTHER	18. OTHER	19. AIR	20. WATER
21. OTHER	22. OTHER	23. AIR	24. WATER
25. OTHER	26. OTHER	27. AIR	28. WATER
29. OTHER	30. OTHER	31. AIR	32. WATER
33. OTHER	34. OTHER	35. AIR	36. WATER
37. OTHER	38. OTHER	39. AIR	40. WATER
41. OTHER	42. OTHER	43. AIR	44. WATER
45. OTHER	46. OTHER	47. AIR	48. WATER
49. OTHER	50. OTHER	51. AIR	52. WATER
53. OTHER	54. OTHER	55. AIR	56. WATER
57. OTHER	58. OTHER	59. AIR	60. WATER
61. OTHER	62. OTHER	63. AIR	64. WATER
65. OTHER	66. OTHER	67. AIR	68. WATER
69. OTHER	70. OTHER	71. AIR	72. WATER
73. OTHER	74. OTHER	75. AIR	76. WATER
77. OTHER	78. OTHER	79. AIR	80. WATER
81. OTHER	82. OTHER	83. AIR	84. WATER
85. OTHER	86. OTHER	87. AIR	88. WATER
89. OTHER	90. OTHER	91. AIR	92. WATER
93. OTHER	94. OTHER	95. AIR	96. WATER
97. OTHER	98. OTHER	99. AIR	100. WATER

Attach to this application a map showing the location of the facility and the location of any existing and proposed water and wastewater treatment, storage, and disposal facilities, and each line where it injects fluids underground water basins in the vicinity. See instructions for precise requirements.

X. NATURE OF BUSINESS (provide a brief description)

This location is primarily a sales/service office, warehouse and accumulation center for Safety-Kleen products consisting of small parts cleaning equipment, solvent and allied products such as hand cleaner, floor cleaner, parts washing brushes, etc. Safety-Kleen collects used solvents from the customer (primarily SQG & VSQG's) for temporary storage at this facility. Once a sufficient quantity of materials is collected, the materials are moved off-site in a semi trailer or tanker quantity to a Safety-Kleen Recycling Center.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
Burton E. Ericson Vice President/General Counsel		<i>Burton Ericson</i>		7/24/87	

COMMENTS FOR OFFICIAL USE ONLY

PA Form 3510-1 (6-80) REVERSE	
revised 11/24/87	

Scott E. Fore
Vice President/Environment, Health & Safety
revised 4/18/88
Scott E. Fore
Vice President/Environment, Health & Safety

87-107

88-118

FORM 3 EPA U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permit Program Information is required under Section 3003 of RCRA. I. EPA I.D. NUMBER F N J D 9 3 2 2 7 0 5 0 6 FOR OFFICIAL USE ONLY APPLICATION APPROVED DATE RECEIVED (yr. mo., & day) COMMENTS

II. FIRST OR REVISED APPLICATION Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in item I above. A. FIRST APPLICATION (place an "X" below and provide the appropriate date) 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) 2. NEW FACILITY (Complete item below.) FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left) FOR NEW FACILITY PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR EXPECTED TO BEGIN

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, in describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process. 1. AMOUNT - Enter the amount. 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	501	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	502	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	503	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	504	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: (Item III-C))		
INJECTION WELL	079	GALLONS OR LITERS			
LANDFILL	080	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	081	ACRES OR HECTARES			
OCEAN DISPOSAL	082	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	083	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	Y	ACRE-Feet	A
LITERS	L	TONS PER HOUR	T	HECTARE-METER	H
CUBIC YARDS	C	METRIC TONS PER HOUR	M	ACRES	S
CUBIC METERS	M	GALLONS PER HOUR	G	HECTARES	Q
GALLONS PER DAY	D	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in the numbers X-1 and X-2 below). A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	S 0 1	76,032	G	7			
2	S 0 2	15,000 30,000	G	8			
3				9			
4				10			

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 C.F.R. Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 C.F.R. Subpart D, enter the four-digit number from 40 C.F.R. Subpart C that describes the characteris-
 tic and/or the toxic constituents of those hazardous wastes.
 B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic constituent entered in column A estimate the total annual quantity of all the non-listed wastes that will be handled which possess that characteristic or constituent.
 C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

D. PROCESSES
 1. PROCESS CODES:
 For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
 For non-listed hazardous wastes: For each characteristic or toxic constituent entered in column A, select the code(s) from the list of process codes contained in item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic constituent.
 Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item (V-D-1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.
 NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:
 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes as to store, treat, and/or dispose of the waste.
 2. In column A of the next line, enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column B (2) on this line enter "included with above" and enter an asterisk (*) in column C. Hazardous Waste Number that can be used to describe the hazardous waste.
 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV: Assume a firm handles X-1, X-2, X-3, and X-4 Subpart - A facility will treat and dispose of an estimated 900 pounds per year of drums having from working and handling operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZ. WASTE (number)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (code)	1. PROCESS CODES (code)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1 K 0 5 4	900	P	T 0 3 D 8 0	
X-2 D 0 0 2	400	P	T 0 3 D 8 0	
X-3 D 0 0 1	100	P	T 0 3 D 8 0	
X-4 D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE									
W 1 0 9 8 2 2 7 0 5 0 6										W DUP									
										2 DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE	A. EPA HAZARD WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASUREMENT (enter code)	D. PROCESSES										E. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
	D	O	O	O	1			1. PROCESS CODES (enter)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
1	D	O	O	O	1	1,330	T	S	O	1	S	O	2																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL ACCESS CODES FROM ITEM D(1) ON PAGE 1

EPA I.D. NO. (enter from page 1)

F N J D 9 8 2 2 7 0 5 0 6 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

40 33 55 N

074 25 49 W

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Burton E. Ericson
Vice President/General Counsel

B. SIGNATURE

Burton Ericson

C. DATE SIGNED

7/24/87

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Burton E. Ericson
Vice President/General Counsel

B. SIGNATURE

Burton Ericson

C. DATE SIGNED

7/24/87

EPA Form 3510-3 (8-80)

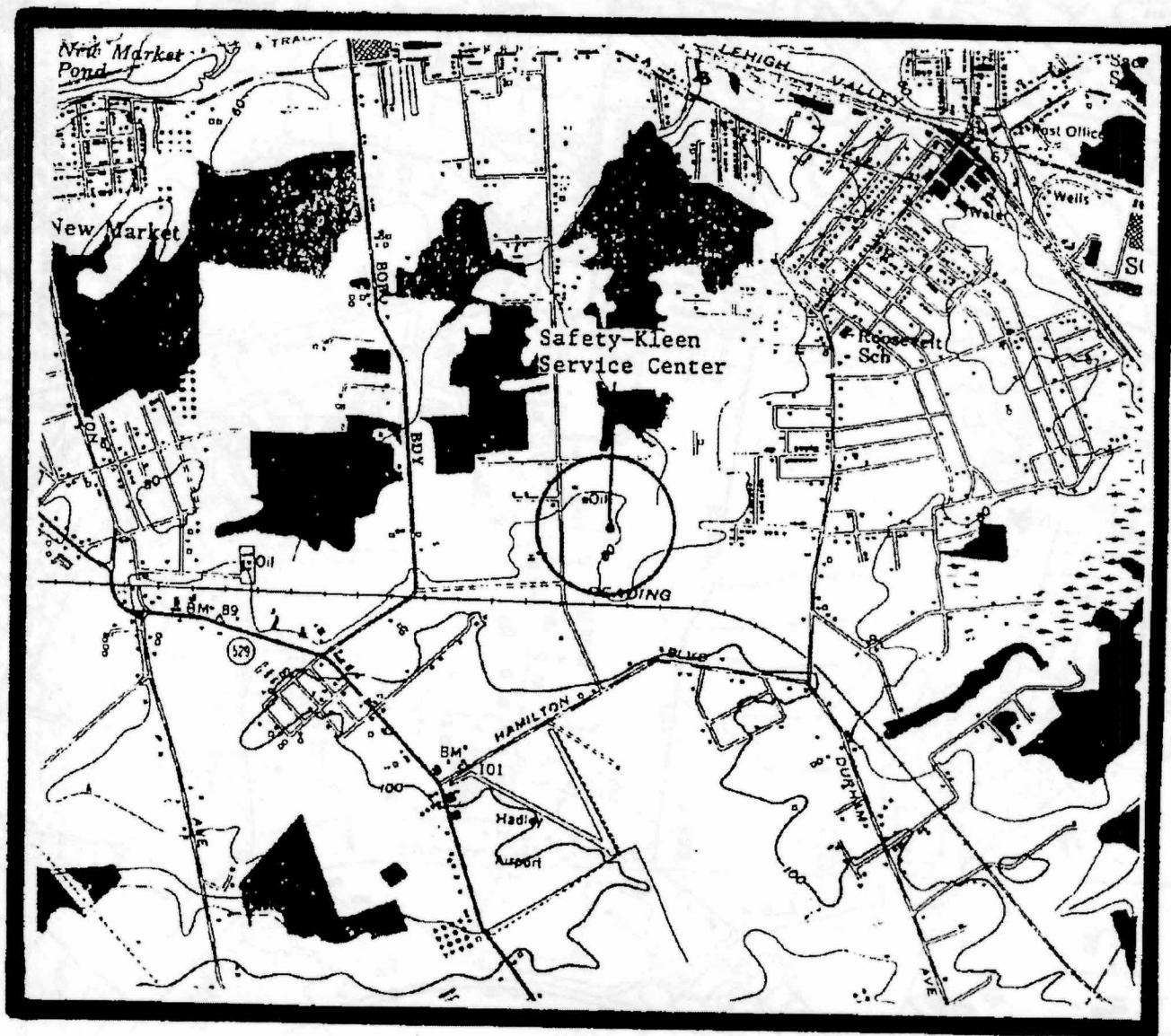
Scott E. Fore
Vice President/Environment, Health
& Safety

revised 4/18/88
Scott E. Fore
Vice President/Environment, Health & Safety

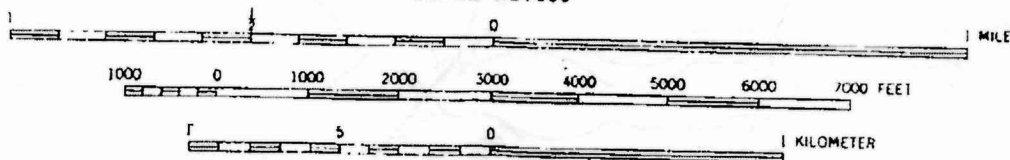
PAGE 4 OF 5

CONTINUE ON PAGE 5

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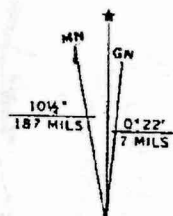


SCALE 1:24000



CONTOUR INTERVAL 20 FEET
DATUM IS MEAN SEA LEVEL

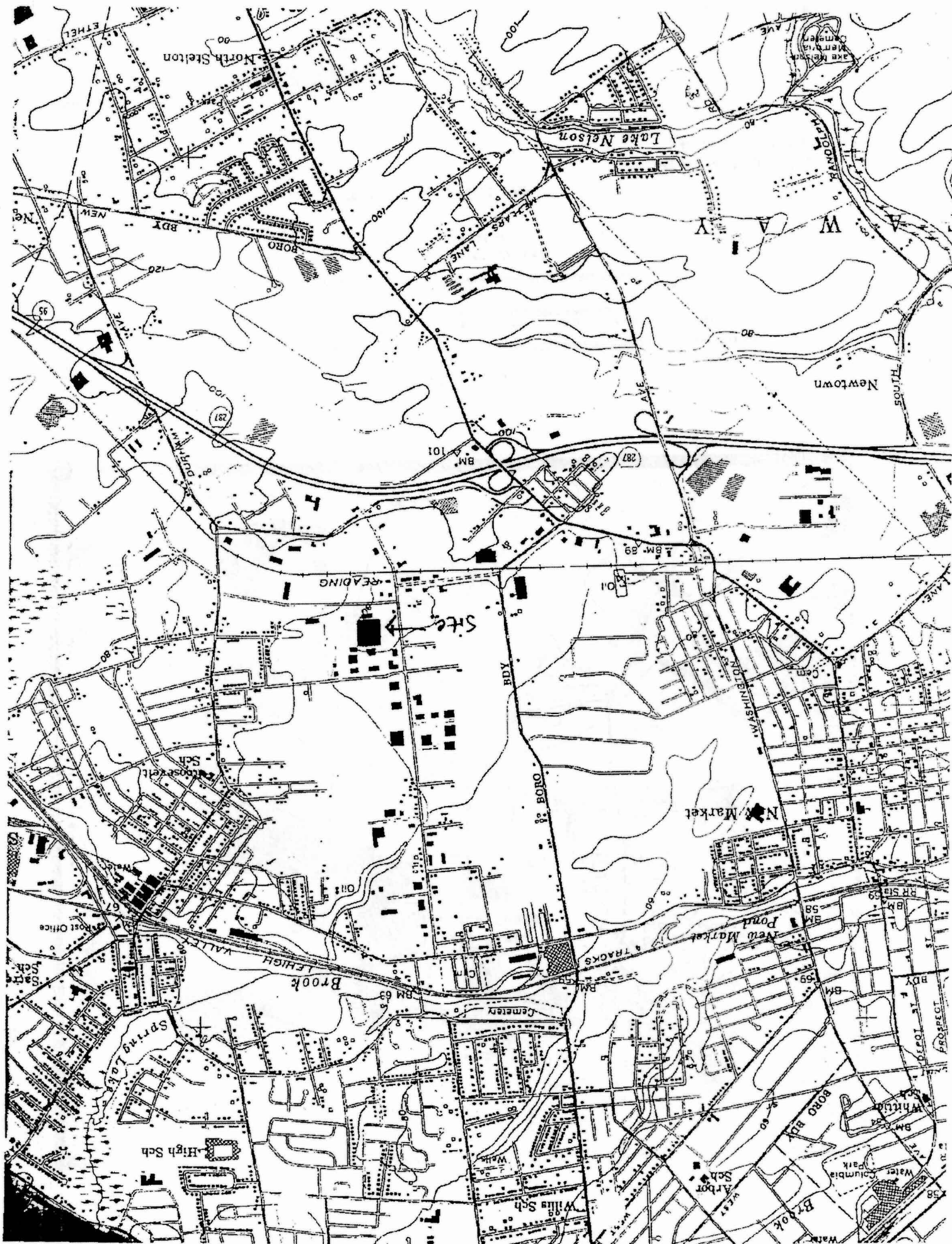
GENERAL LOCATION MAP

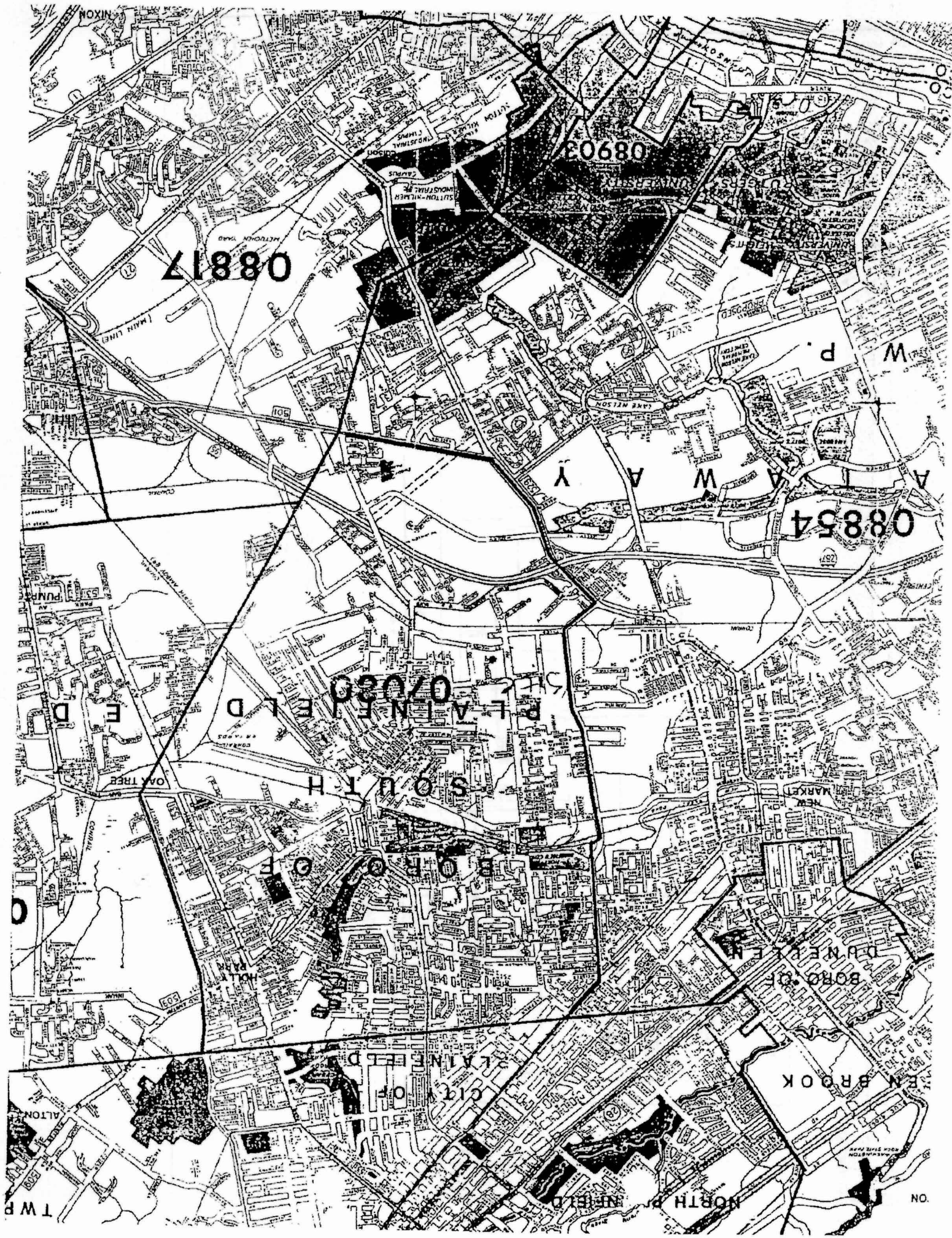


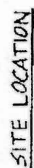
UTM GRID AND 1955 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

PLAINFIELD, N. J.
N 4030—W 7422.5/7.5

1955





[illegible]

SECRET

Two new buyers

NR 7d E115
SITE P114

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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STORAGE FACILITY
PERMIT APPLICATION
SAFETY-KLEEN CORP. SERVICE CENTER
AND ACCUMULATION CENTER
SOUTH PLAINFIELD, NEW JERSEY
NJD 982270506

Prepared by: SAFETY-KLEEN CORP.

July 17, 1987

revised: November 25, 1987

revised: April 18, 1988

CERTIFICATION STATEMENT

South Plainfield, New Jersey Service and Accumulation Center

The undersigned, being a vice president of Safety-Kleen Corp., the permit applicant, certifies under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

David A. Dattilo
David A. Dattilo
Vice President, Sales and Service

July 25, 1987
Date

ATTESTATION

The undersigned, attesting witness to the Certification Statement and this document dated July 17, 1987, of which this affidavit is a part, states that I am personally responsible for the preparation of the document, that I personally gathered the information contained herein, and further that the information, to the best of my knowledge and belief, is true, accurate and complete.

Paula M. Ventura
Paula M. Ventura
Environmental Permit Writer

July 20, 1987
Date

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FACILITY DESCRIPTION

ABSTRACT

CORPORATE HEADQUARTERS: Safety-Kleen Corp.
777 Big Timber Road
Elgin, IL 60123
312/697-8460

RESPONSIBLE OFFICIAL: David A. Dattilo
Vice President, Sales and Service

FACILITY ADDRESS: Safety-Kleen Corp. (2-118-04)
Skyline Drive
South Plainfield, New Jersey 07080

TELEPHONE NUMBER: 201/356-2229

U.S. EPA I.D. NUMBER: NJD 982270506

GEOGRAPHIC LOCATION: 40° 33' 55" N
74° 25' 49" W

OWNER: Safety-Kleen Corp.

DESCRIPTION OF ACTIVITIES: This site includes: (1) a service center which is a collection point for spent solvents generated by Safety-Kleen customers, the majority of whom are small quantity generators; and, (2) an accumulation center which is a collection point for containerized spent solvents shipped from nearby Safety-Kleen service centers and Safety-Kleen customers. All wastes are ultimately shipped to a Safety-Kleen recycling facility or to a contract reclaimer and then are returned to the Company's customers as product.

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PROPERTY DESCRIPTION: 2.5 acres with the following structures:

- a. one building for the service center with offices and a warehouse for container storage;
- b. a second building for the accumulation center which includes offices and a warehouse for container storage;
- c. three aboveground storage tanks (one for product, one for spent solvent and one for waste oil) with concrete diking; and
- d. one loading dock with a solvent return and fill station.

FACILITY TYPE: Storage in an aboveground tank (S02) and in containers (S01)

STORAGE UNIT	CAPACITY (GAL.)	SECONDARY CONTAINMENT(GAL.)	MATERIAL TO BE STORED
Tank	15,000	33,660	Spent Mineral Spirits Solvent (D001, D008)
Container Storage-- Warehouse	6,912	2,705	Dumpster Sediment (D001, D006, D008) Spent Immersion Cleaner (F002, F004) Dry Cleaning Waste (F002)
Container Storage-- Accumulation Center	69,120	8,442	Same as Service Center and Paint Waste (D001, D006, D007, D008, F003, F005) Industrial Solvents (F001, F002)
Waste Oil Tanks	15,000	33,660	Waste Oil (X721, X724, X726)

1.0 FACILITY DESCRIPTION

1.1 DESCRIPTION OF BUSINESS ACTIVITY

Safety-Kleen Corp. is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance and dry cleaning. The company has been operating since 1968 offering solvent collection and reclamation services for its 350,000 customers, more than 99% of whom generate less than 1000 kilograms (2200 pounds) per month. In 1986, Safety-Kleen reclaimed more than 30 million gallons of spent solvent.

Currently, Safety-Kleen offers six services, four of which involve the accumulation and storage of spent solvent and waste oil at 164 service centers in 46 states. These wastes are shipped from the service centers to one of Safety-Kleen's recycle centers or to an independent reclaimer and are then returned to customers as usable product. A unique feature of this system is that Safety-Kleen retains ownership of the parts cleaning machines and the solvent. This "closed loop" system allows the Company to maintain control of the solvent except while it is in use at the customer's place of business. A description of each of these four services follows.

1.1.1 Parts Cleaner Service

The original service offered by the Company in 1968 was the parts cleaner service and it remains the primary business activity. This service involves the leasing of a small parts degreasing unit which consists of a sink affixed to a 16- or 30-gallon drum containing Safety-Kleen 105 Solvent (mineral spirits). On a regularly scheduled basis, a Safety-Kleen sales representative cleans and inspects the parts washer machine and replaces the drum of used solvent with one of clean product. Each sales representative performs about fifteen of these services per day, collecting the drums of used solvent on a route van.

At the end of each day, the solvent is transferred from the drums to a storage tank at the service center and drums of product are prepared for the next day's services. Periodically, a tanker truck is dispatched from one of the recycle centers to deliver a load of clean solvent and collect the spent solvent at the service center. Two-thirds of the solvent used by Safety-Kleen customers has been reclaimed with the remainder being purchased from a vendor.

Safety-Kleen has also established a parts cleaner service for users who own their machines. This service, known as the Customer Owned Machine Service, provides a solvent reclamation service to these customers regardless of machine model.

A second type of parts washer, the immersion cleaner, is available for the removal of varnish and gum from such things as carburetors and transmissions. This machine consists of an immersible basket with an agitator affixed to a 16-gallon drum containing a chlorinated solvents/cresylic acid blend. The spent solvent remains in the drum after delivery to the service center where it is stored in a contained area of the warehouse. Periodically, a box trailer truck is dispatched from a recycle center to deliver drums of fresh solvent and collect the drums of spent solvent for reclamation.

1.1.2 Dry Cleaner Service

In 1984, Safety-Kleen began offering a service for the collection of filter cartridges and still bottoms contaminated with dry cleaning solvents (usually perchloroethylene). These wastes are drummed or boxed on the customer's premises and are periodically collected by a sales representative. The drummed waste is accumulated in a contained area of the warehouse for shipment to a Safety-Kleen recycle center. About 35% of this waste is returned to dry cleaners as usable product.

1.1.3 Paint Waste Collection Service

In 1986, a paint waste reclamation program was initiated to service automobile body repair businesses. Wastes containing various thinners and paints are collected in 5-gallon pails and 16-gallon drums on the customer's premises. The sales representative collects these containers

and stores them in the drum storage area of the accumulation center warehouse. These wastes are periodically shipped to a reclaimer and the regenerated solvent is distributed to Safety-Kleen customers for use as product.

1.1.4 Industrial Solvents Collection Service

Safety-Kleen offers generators of large quantities of industrial solvents a reclamation service through its industrial solvents collection service. Wastes containing mineral spirits, halogenated solvents and lacquer thinners are shipped from the generator to the accumulation center in 55-gallon drums. The drums are then shipped to the Safety-Kleen recycle center in Clayton, New Jersey or to an independent reclaimer.

1.1.5 Waste Oil Collection Service

In 1988, a waste oil collection service was initiated to service automotive service businesses. Waste oil is collected by a 3,500-gallon tanker truck which returns to the service center when full and stores the waste in the 15,000-gallon storage tank. These wastes are periodically shipped to a Safety-Kleen oil rerefinery and the rerefined oil is distributed to Safety-Kleen customers for use as product.

1.2 DESCRIPTION OF THE FACILITY

Property for the South Plainfield service center was purchased on

April 30, 1987. The South Plainfield service center replaces the Safety-Kleen service center formerly located in Boundbrook, New Jersey and serves customers in the same geographic region. The facility consists of the following structures:

- a. a 10,000 square foot warehouse with offices and a contained area for drum storage (service center);
- b. an 8,000 gallon square foot warehouse with offices and a contained are for drum storage (accumulation center);
- c. eight above-ground storage tanks, with diking: one 15,000 gallon tank contains spent solvent (for use by the service center only), one 8,000 gallon tank (sump storage tank on D 12054) is used for secondary containment purposes (for use by the accumulation center only) and the remaining six contain solvent product, and one 15,000 gallon tank for waste oil; and
- d. a solvent return and fill station with loading docks (for use by the service center only).

Descriptions of the surrounding area and of waste management practices at the site follow. Applicable maps and facility drawings are in Appendix C.

1.2.1 Regional Description

The South Plainfield service center is located in Middlesex County on Skyline Drive approximately 600 feet south of Montrose and north of Highway 287. This area is zoned for manufacturing and to the best of Safety-Kleen's knowledge, no easements or title, deed or usage restrictions exist which would be in conflict with operations at this site.

The Borough of South Plainfield had a population of 21,152 in 1986. The employment of the population is quite varied, however, manufacturing and warehousing provide jobs for much of the population. South Plainfield is located approximately 40 miles directly west of New York's Lower Bay which connects with the Atlantic Ocean.

The soil in the area of the service center is the Klinesville type. This is a shallow, well drained soil on uplands. This material formed in material weathered from shale, siltstone and sandstone. The soil is composed of a dark, reddish brown very shaley silt loam surface which overlies a reddish brown, very shaley silt loam. Bedrock in the area of these soils is typically less than two feet from the surface. Slope in the area of the facility is 0-3%.

No parks, schools, wetlands or critical habitats are known to exist within one quarter mile of the facility.

The facility is located at the south end of Skyline Drive which is a dead end street. South of it is the Reading Railroad right-of-way and utility lines do extend south on Skyline Drive. An eight inch water line, located under the west side of the street, supplies water to the service center. The water is supplied by the Elizabethtown water service. No public wells or surface water supplies are located within a mile of the service center. A sanitary sewer, maintained by the Borough of South Plainfield, is located on the western border of the site. A sanitary sewer line also extends south from Montrose under Skyline Drive. Surface water drains to drainage ditches which flow in a northerly direction to a drainage ditch on Montrose. The elevation at the service center is approximately 80 feet above sea level.

The non-building areas of the facility are paved with asphalt, concrete or gravel as noted on the Site Plan in Appendix C. The majority of the vehicular traffic and loading/unloading operations occur at and near the return and fill station and this area is paved with concrete. The entrance to the facility is on Skyline Drive which is the major access road to the facility. The access road was designed in accordance with engineering criteria appropriate for sustaining the traffic volume and loading for the manufacturing activities in this area. The route vans that daily travel the routes between the service center and its customers use

the two-lane approach driveway. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area.

Trucks based at this facility daily travel the routes between the service center, accumulation center, Safety-Kleen customers and other Safety-Kleen service centers. They use the two-lane approach driveway on Skyline Drive and are parked in or between the two buildings at night. The trucks dispatched from the recycle center to deliver and pick up fresh and used solvents perform these activities at the aboveground tank area and at the overhanging doors of the drum storage areas. All trucks use Skyline Drive as an access to I-287. The tanker trucks which serve the service center use the asphalt drive that surrounds the entire facility (see the Site Plan. The tanker enters the northeast gate, empties and fills his tank and leaves through the northeast gate (i.e., he travels clockwise around the facility). A tanker truck services this facility about once every ten days. The box trailer truck services this facility about once every ten days by backing up to the loading dock on the east side of the building, and loading the palletized drums.

1.2.2 Waste Management Practices

The South Plainfield site was designed to facilitate the handling and storage of the wastes resulting from the services offered by Safety-Kleen. The aboveground storage tanks, drum storage areas and the return and fill station all have secondary containment and the service center has the

equipment necessary for employees to safely manage wastes onsite. Appendix C contains drawings of the waste management facilities.

Spent mineral spirits from parts washers is accumulated in a 15,000 gallon aboveground storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of spent solvent, respectively, are poured into the dumpsters in the return and fill station, and material in the dumpster is pumped into the storage tank for spent solvent. The return and fill station has secondary containment in the form of a 2,041 gallon sloped floor and sump at its base. In addition, waste oil is pumped directly from a 3,500 gallon tanker truck to the 15,000-gallon storage tank.

The aboveground tanks have been designed in accordance with NFPA standards and are constructed of carbon steel painted white to reflect sunlight. The secondary containment for the mineral spirits tanks is a steel reinforced concrete dike measuring 60' x 25' x 3' which holds 33,660 gallons. Two tanks holding 15,000 gallons each are in the diked area; one is for clean and one is for spent mineral spirits. A third 15,000 gallon tank will be installed for the storage of waste oil. Each tank is equipped with an audiovisual high level alarm.

The container storage area in the service center warehouse is used for

the storage of (1) sediment from cleaning the dumpsters in the return and fill shelter, (2) spent immersion cleaner and (3) dry cleaning wastes. The wastes are not mixed while on site and different wastes are segregated in color-coded drums to indicate their contents: dumpster sediment in red 16-gallon drums, immersion cleaner in gray 16-gallon drums, and dry cleaning waste in 16-gallon drums with blue lock rings and in boxes. While the wastes are not incompatible with one another, it is necessary to segregate them for inventory and quality control purposes.

The drum storage area in the service center has secondary containment in the form of a sloped floor with a 12' x 2' x 1.75' (312 gallons) collection trench. The sloped floor holds 2,705 gallons; no more than 6,912 gallons of spent solvents will be stored in the drum storage area at any one time.

The accumulation center is used for the collection of containers and boxes from Safety-Kleen service centers and industrial solvents customers prior to shipment to a Safety-Kleen recycle center or an independent reclaimer. Eleven service centers in four states ship their drummed wastes (dumpster sediment, spent immersion cleaner, dry cleaning wastes and paint wastes) to this warehouse for storage prior to reclamation. In addition, industrial solvents customers ship their drummed wastes directly to the accumulation center for storage.

The drum storage area in the accumulation center has secondary containment in the form of a sloped floor with trenches at the lowest

point. This facility has 8,442 gallons of secondary containment; no more than 69,120 gallons will be stored.

The containers will be stored in the configurations shown on the Floor Plans in Appendix C. Two and a half feet of aisle space will be maintained and the drums will be stored no more than two high. Containers in the drum storage areas will be placed on pallets and moved with a forklift or pallet jack.

WASTE ANALYSIS PLAN

ABSTRACT

Waste Description	EPA Waste Code Nos.	Facility ¹ Capacity	Annual ² Amount
Spent Mineral Spirits	D001, D008	15,000	320
Bottom Sediment From the Tank	D001, D006, D008	N/A	2
Drummed Mineral Spirits Waste	D001, D006, D008	76,032 ³	61
Spent Immersion Cleaner	F002, F004		85
Halogenated Solvents	F001, F002		585
Spent Lacquer Thinner	D001, D006, D007, D008, F003, F005		218
Waste Oil	X721, X724, X726	15,000	1,500

¹ The facility capacity is in gallons.

² The annual amount is in thousands of gallons.

³ The total amount of drummed waste stored in the warehouse will not exceed 76,032 gallons.

2.0 WASTE ANALYSIS PLAN

2.1 DESCRIPTION OF WASTES

Six types of waste result from the servicing of Safety-Kleen customers and the maintenance of the service center. Analytical data for the wastes and specifications for the products are in Appendix D and qualitative descriptions follow.

2.1.1 Wastes Resulting From the Parts Washer Service

Spent mineral spirits from parts washers is accumulated in a 15,000 gallon aboveground storage tank via the return and fill station. 16- and 30-gallon drums containing seven and twelve gallons of solvent, respectively, are poured into a dumpster at the return and fill station which in turn empties into the tank. This waste handling method results in three types of mineral spirits waste:

- a. Spent mineral spirits solvent--The spent mineral spirits solvent is removed from the tank by a tanker truck on a scheduled basis. About 6,000-7,000 gallons are removed every two weeks. This waste is ignitable (D001) and EP Toxic (D008). In 1986, the Boundbrook service center shipped 246,000 gallons of spent solvent to the Safety-Kleen recycle center in Clayton, New Jersey.

- b. Bottom sediment in the tank--Approximately once every two years, it is necessary to remove sediment and other heavy material from the bottom of the tank. A Safety-Kleen vacuum truck is used for this purpose and can collect up to 4,000 gallons of this waste for reclamation. The sediment is ignitable (D001) and EP Toxic (D006 and D008).
- c. Dumpster sediment--Sediment also accumulates in the bottom of the dumpsters in the return and fill station. This sediment is removed manually with a shovel, drummed and the drums are stacked two-high in the drum storage area of the warehouse. About ten gallons is stored in each 16-gallon drum and the drum is color-coded (red) to indicate its contents. The chemical composition of this waste is analogous to that of the bottom sediment from the tank. In 1986, about 2,000 gallons of this waste were shipped to Safety-Kleen's Clayton, New Jersey recycle center for reclamation. It is estimated that 22,000 gallons will be shipped from the accumulation center annually.

Immersion cleaner remains in the drum in which it was originally used until it is received at the recycle center. Drums containing about four and one-half gallons of spent solvents are stacked two-high in the drum storage area of the warehouse. The immersion cleaner contains chlorinated solvents (F002) and cresylic acid (F004) and the drums are color-coded gray. In 1986, about 6,000 gallons of these solvents were shipped to the

Clayton, New Jersey recycle center for reclamation. It is estimated that 85,000 gallons will be shipped from the accumulation center on an annual basis.

2.1.2 Wastes Resulting From the Dry Cleaner Service

Dry cleaning wastes consist of spent filter cartridges, powder residue from diatomaceous or other powder filter systems and still bottoms. These wastes are packaged on the customer's premises in black 16-gallon drums with blue lock rings and in lined boxes. The drums are then palletized, stacked two-high and placed in the drum storage area of the warehouse along with the boxes. While approximately 80% of the dry cleaning solvent used is perchloroethylene (F002), about 17% is mineral spirits, (D001) and the remaining 3% is trichloro-trifluoroethane (F002). In 1986, about 27,600 gallons of dry cleaning wastes were shipped to the Safety-Kleen recycle center in Hebron, Ohio. It is estimated that 427,000 gallons will be shipped from the accumulation center on an annual basis.

2.1.3 Paint Wastes

Paint wastes consist of various lacquer thinners (D001, F003, and F005) and paints (D006, D007 and D008). The waste is collected in black 5-gallon pails and in 16-gallon drums at the customer's place of business and the containers are then palletized and stored in the drum storage area of the warehouse. It is anticipated that this facility will ship 14,300

gallons of paint waste to a reclaimer annually and the accumulation center will ship 157,000 gallons annually.

2.1.4 Industrial Solvent Wastes

Seven solvents are collected from industrial solvent users: mineral spirits (D001, D006, D008); 1,1,1-trichloroethylene (F001, F002); per-and trichloroethylene (F001, F002); methylene chloride (F001, F002); 1,1,2-trichloro-1,2,2-trifluoroethane (F001, F002) and lacquer thinners (F003, F005). These wastes are shipped in 55-gallon drums and are stored on pallets. It is anticipated that 8,600 gallons of spent mineral spirits, 157,600 gallons of spent halogenated solvents and 60,400 gallons of spent lacquer thinners will be shipped from the accumulation center to a reclaimer on an annual basis.

2.1.5 Waste Oil

Waste oil is usually collected from automobile service stations which have used it for lubrication purposes. It contains heavy metals (lead and cadmium), heavy oils, light aliphatic hydrocarbons (including gasoline components), sediment and water. It is anticipated that 1,500,000 gallons of waste oil will be shipped from this facility to a reclaimer annually.

2.2 QUALITY CONTROL PROCEDURES

The used solvents are the primary feedstocks for the generation of Safety-Kleen solvent products. As a result, quality control of the spent solvents is necessary to ensure that reclamation occurs in the safest and most efficient manner possible. The service center collects spent solvents from over 2,600 customers, most of whom are small quantity generators, and about thirty-five thousand drums containing recoverable solvents are returned to the service center each year for shipment to a reclaimer. With such large numbers of waste generators and waste shipments, performing detailed analyses at the service center is economically and logistically infeasible.

Furthermore, as discussed earlier in the Facility Description, all the materials collected at the service center are managed at all times in the closed loop system and are usually collected from a company with a single process. The composition and quality of these materials are known and Safety-Kleen's operating experiences have shown that the collected materials rarely deviate from company specifications. As an additional safeguard, Safety-Kleen personnel are instructed to inspect all materials before returning them to the service centers. This mode of operation has been proven to safeguard the recycling process and maintain a quality product.

In accordance with N.J.A.C.7:26-9.4(b), however, Safety-Kleen will perform physical and chemical analysis of a waste stream when it is

notified or has reason to believe that the process or operation generating the waste has changed, or when the result of inspection indicates that the waste collected does not match that designated. It is Safety-Kleen's practice that suspected non-conforming material must not be accepted until a full analysis has been done or the material must be rejected. The analyses performed will be identical to those outlined on tables D-1 through D-4. Procedures to verify waste characteristics occur at several check points in the management of the solvent, as described below.

2.2.1 Parts Washer Service

Prior to leasing a parts cleaning machine, the customer's business activity is reviewed. Where the possibility exists for contamination of the mineral spirits (e.g., pesticide, herbicide or pharmaceutical operations), the process is reviewed to insure that the solvent is protected from the sources of contamination.

Sales representatives are instructed to visually examine the spent solvents when the machines are serviced, noting the quantity, odor and appearance of the material recovered:

- a. The quantity of used solvent in the drum--Normally the 16-gallon drum of spent mineral spirits contains approximately seven gallons of liquid, the 30-gallon drum about twelve gallons and the 16-gallon drums of spent immersion cleaner about four and one-half gallons. When the amount of liquid is

substantially different from the expected quantity, an inquiry of the customer's operation and handling procedures is made. Contingent on the customer's responses, the solvent is left with him or accepted. Should there still be questions as to the drum's contents, an analysis is required to determine its acceptability.

- b. The odor of the liquid in the drum--Should the odor of the liquid in the drum be different from that of the mineral spirits or immersion cleaner, the drum is set aside for further action as described in item 'a'.

- c. The appearance of the liquid in the drum--The used mineral spirits should always be greenish-brown in color and float on water. The immersion cleaner is a two phase system consisting of an upper moderately alkaline water layer (20% by volume) and a lower solvent layer (80% by volume). Spent immersion cleaner should have a dark brown aqueous layer on top and the solvent should also be dark brown. Liquids in the drums which deviate from the above descriptions or which contain substantial amounts of water, high density solvent and/or oil at the bottom should be set aside for further action as described in item 'a'.

At the service center, the sales representative or the warehouseman again observes the quantity, odor and appearance of the solvent prior to

emptying the solvent into the wet dumpster. Drums with questionable contents are set aside and the customer is questioned. Pending his response, the drum is accepted, returned to the customer, or properly disposed of at the customer's expense. The immersion cleaner drums are never opened at the service center so additional verification is not possible until it reaches the recycle center.

2.2.2 Dry Cleaner Waste, Paint Waste and Waste Oil Collection Services

The dry cleaning waste, paint waste and waste oil are collected from facilities where one process is managed and the possibility of cross-contamination from other chemicals or wastes is minimal. The contents of the drums are verified by the sales representative when he services the customer and, comparable to the handling of immersion cleaner, there is no contact with the wastes until they reach the recycle center.

2.2.3 Industrial Solvent Collection Service

Prior to accepting an industrial solvents customer's waste for recycling, a sample is drawn and analyzed at Safety-Kleen's laboratory in Denton, Texas. The criteria used to determine whether a waste is acceptable for recycling are in Appendix D. The drums are not opened until they reach the recycle center. Samples of the waste collected at the recycle center and the contents of the drum are either verified and accepted or rejected. Rejected wastes are either returned to the customer or properly disposed of.

2.3 WASTE ANALYSES AT THE RECYCLE CENTER

Analyses performed at the Safety-Kleen recycle centers are undertaken to safeguard the recycling process and to assure the product quality. The following tables in Appendix D summarize a typical waste analysis plan practiced at the recycle center for the hazardous materials returned from the service center:

Table D-1 Parameters and Rationale for Hazardous Waste Selection

Table D-2 Parameters and Test Methods

Table D-3 Methods Used to Sample Hazardous Wastes

Table D-4 Frequency of Analysis

A profile of the paint waste is in Appendix D. It will be reanalyzed when the reclaimer to whom it is shipped requests reanalysis or when a change in the use of the product occurs.

2.4 WASTE ANALYSIS PLAN UPDATE

This waste analysis plan will be modified when a new waste product is collected or when sampling and material management methods change. Revision of the plan is the responsibility of the Environmental Affairs Department at Safety-Kleen's Corporate Office in Elgin, Illinois.

PREPAREDNESS AND PREVENTION PLAN

ABSTRACT

SECURITY MEASURES--The site is secured as follows:

- a. There is a chain link fence with three strands of barbed wire around the facility.
- b. Warning signs are posted at all entrances.
- c. Locks are on all entrances to the warehouses.
- d. Remote controls for all tank operations are inside the warehouse.
- e. There is twenty-four hour outdoor lighting.

INSPECTION PROCEDURES: See Appendix E for a copy of the Facility Inspection Record and Procedure.

REQUIRED EQUIPMENT--The emergency equipment requirement is met with the following:

- a. Internal communications will be by voice and intercom.
- b. Telephones are available in the office and in the warehouses.
- c. Fire extinguishers are available next to three exits in each warehouse.
- d. Water is available from the Elizabethtown Water Service.

3.0 PREPAREDNESS AND PREVENTION PLAN

3.1 SECURITY MEASURES

The facility is secured with a six-foot high chain link fence topped by three strands of barbed wire. All access gates are locked when the facility is unoccupied and warning signs stating "Danger - Unauthorized Personnel Keep Out" which are visible from twenty-five feet are posted at the entrances. In addition, outdoor lights remain on at all times.

The office/warehouse buildings are secured with locks on all doors and warning signs are posted at all entrances to work and waste storage areas.

The tanks are inaccessible in that material can not be added to or removed from them without activating the pumps, the controls for which are inside the warehouse. The pumps are not activated unless mineral spirits product or waste is being added to or removed from the tanks by Safety-Kleen personnel. In addition, warning signs are posted on the return and fill station.

3.2 INSPECTION PROCEDURES

The branch (i.e., service center) and accumulation center managers or their designates are responsible for carrying out and documenting the

facility inspections (Appendix E) on a daily basis. They must note any repairs that are needed and assure that they are completed. If they can not carry out the repairs, they must notify the Technical Services Department at Safety-Kleen's corporate headquarters and request assistance. Completion of repairs must also be noted on the Facility Inspection Record.

The regional manager is the supervisor of several branch managers in a geographic area. He must review the Facility Inspection Record on a quarterly basis to insure that they are properly completed and that any necessary repairs have been effected.

The facility inspection includes the following:

- a. Tank inspections--At a minimum, the tank holding the solvent product is inspected weekly and that holding the spent solvent is inspected daily. The inspections include checks of the high level alarm and of the volume held in the tank. Sudden deviations in the solvent volumes will be investigated and their causes determined. If necessary, repairs must be initiated immediately. When the tank used to store spent solvent is 85% full, a pickup must be scheduled with the Solvent Control Department in Safety-Kleen's corporate headquarters. The solvent must not exceed 95% of the tank volume at any time.

With reference to numbers 1, 2 and 3 of the Facility Inspection

Record, the tanks at the South Plainfield service center have gauges to determine volumes; it is not necessary to determine the liquid level in inches and then convert to gallons. In addition, the water depth measurement is not applicable to aboveground tanks since the presence of water is an indicator of an underground tank leak. Sludge (bottom sediment) can not be determined in an aboveground tank except by inserting a measuring tape from the top. Due to the safety hazards and logistics involved, the sludge depth is estimated and its scheduled removal is based on past experience.

The secondary containment for the tanks must be checked for cracks or other deterioration. Any damage to tanks (such as rust or loose fixtures) or secondary containment must be noted and repairs initiated.

- b. Solvent dispensing equipment--The solvent dispensing hose, connections and valves must be inspected for damage (such as cracks or leaks) and proper functioning. Any solvent in the hoses must be drained after use. The pumps, pipes and fittings must also be checked for damage and proper functioning. Any damage to the solvent dispensing equipment must be noted and repaired.
- c. Drum storage areas--The drum storage areas are inspected daily and the number and condition of the drums noted. The total

volume of the spent solvent held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must be placed in a drum of adequate integrity. Finally, the drums must be properly labeled and marked in accordance with U.S. DOT and New Jersey hazardous waste regulations. The secondary containment system must be inspected for deterioration or failure. If cracks or leaks are detected, they must be repaired immediately.

- d . Route vehicles--Each route vehicle must be inspected daily to insure the proper operation of its brakes, lights, turn signals, emergency flashers and wipers. In addition, the necessary safety equipment must be on board: sorbents, fire extinguisher, eye wash, first aid kit, reflector kits, rubber gloves, plastic aprons, and safety glasses. Any missing equipment must be replaced.

- e. Dumpsters--The wet dumpsters (in the return and fill station) must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately and excess sediment must be removed from the dumpster. The dry (trash) dumpster must be inspected to insure that no liquids are being placed in it.

- f. Safety equipment--The fire extinguishers must be checked to insure that the units are charged and accessible. In addition, the operation of the eyewash must be confirmed and the first aid kit and sorbents must be inspected for adequate content and accessibility. A list of required emergency equipment is in Appendix E.
- g. Security--The operation of each gate and lock must be checked daily. In addition, the fence must be inspected for deterioration on a weekly basis.

3.3 FACILITY DESIGN

The South Plainfield service center was designed to minimize the possibility of spills or fires and to minimize the effects of any accidents which may occur. Specifications for the storage facilities, secondary containment and other equipment are in Appendix E and descriptions follow.

3.3.1 Tank Storage

The 15,000 gallon storage tank is 12' in diameter and 18' long. It is constructed of 1/4" thick carbon steel painted white to reflect sunlight. The tanks are constructed in accordance with Underwriters Laboratories Standard 142 and they are located more than 20 feet from the property line, in accordance with National Fire Protection buffer zone requirements. The

secondary containment for the tanks consists of a monolithically poured slab and dike wall. The slab is six and the wall is eight inch thick steel reinforced concrete. In addition, the tanks are housed in a waterproof canvas shell.

The tanks are equipped with an aural (siren) and visual (strobe light) high level alarm system which will alert employees when the tank is approximately 350 gallons from being full.

The return and fill station is a sheet steel structure as is the dumpster. The secondary containment is a monolithically poured concrete slab. The dumpsters are tight-piped to the tank and all piping is aboveground.

3.3.2 Drum Storage

The slab, curbing and collection trenches for the drum storage area in the warehouses are made of steel-reinforced concrete and the concrete has been poured so that no cracks or gaps exist between them. The floors are sloped except where there are trenches. Steel grates cover the trenches to facilitate the movement of drums across them.

The mineral spirits, immersion cleaner, dry cleaning waste and paint wastes are compatible with the drums in which they are stored; in fact, mineral spirits is sometimes used as a rust-preventive coating for steel. Dry cleaning still bottoms and powder residue are stored in black

polyethylene drums and filters in nylon-lined, triple-thickness cardboard boxes, both of which are DOT-approved containers. The drums have been treated with fluorine gas to be resistant to dry cleaning solvents and they will be palletized whenever possible (nine 16-gallon drums per pallet) to facilitate shipping. The boxes may be stacked while in storage and during transport.

The paint waste and immersion cleaner containers are labeled with "Flammable" and "Corrosive" diamonds, respectively, as required by DOT regulations. Other materials stored (i.e., halogenated solvents and mineral spirits) do not require labels. All containers of waste marked in accordance with 40 CFR 262.32. The customer is indicated as the generator for customer to service center shipments. Upon arrival at the South Plainfield facility, any drums used for storage are remarked with Safety-Kleen indicated as the generator.

Containers are transported on pallets or individually. Palletized wastes are wrapped in plastic shrink wrap and moved using a forklift or a pallet jack. When moving pallets from the service center to the accumulation center, they are loaded onto a truck and moved. Individual drums are moved using a hand cart.

The sumps in the warehouses are closed and no piping is associated with them. The sumps in the accumulation center are piped to the 8,000 secondary containment tank. Piping diagrams are in Appendix E. The sumps are emptied using a wet/dry vacuum cleaner (specifications are in Appendix

E). Drums can be used as needed with this vacuum and removal of any liquid in the sumps must take place immediately. Any liquid pumped to the secondary containment tank is removed by tanker truck. All material collected from spill cleanups will be treated as hazardous waste. The material will be sampled and analyzed at the recycle center and, depending on the percentage of recoverable solvent, the material will be recycled or properly disposed of.

3.4 PLANT OPERATIONS--POTENTIAL SPILL AND FIRE SOURCES AND CONTROL PROCEDURES

Employees must perform their duties in the safest, most efficient manner possible and the service center has been equipped to facilitate these activities. Drums and boxes will be moved using a handcart and pallets using a forklift or pallet jack. A hoist is available at the branch to assist in the lifting of heavy items. Upon arrival at the facility, containers of spent solvent must immediately be added to the storage tank or placed in the drum storage areas. Open drums of solvent must not be left unattended. Below are descriptions of situations which can result in accidents and the precautions taken to prevent their occurrences.

3.4.1 Potential Minor Spill Sources

The following is a list of activities that have the potential for a minor (one that can be remediated without assistance from a clean up contractor) pollution incident:

- a. Pouring of drummed solvent into the dumpster--As the 16- and 30-gallon drums are poured into the dumpster, solvent can splash out. Employee training emphasizes the importance of taking care in emptying the drums. The return and fill station is underlain by a concrete slab with a floor drain that empties into the storage tank. This design will contain this type of spill.
- b. Filling of drums with solvent product--A low pressure hose with an automatic shut-off valve, similar to those used at automotive service stations, is used to fill the drums with solvent. Leaking fittings, a damaged hose or carelessness could lead to the discharge of solvent outside of the drum. Manual emergency shut-off valves are on each hose, should the equipment not function properly. In addition, employee training emphasizes the importance of inspection, maintenance and reporting of conditions with pollution incident potential.
- c. Moving of containers--When a container is moved, a potential exists for it to tip over. To minimize the potential for

spillage of solvent, all containers must be maintained in an upright position and remain tightly covered while in storage or in transit.

- d. Delivery truck transfers--The cargo should be secured in the route vehicle with straps before transport. Individual containers of solvent can tip over or be dropped when being moved on or off a delivery truck so transfers will be made using a handcart and a hoist, if necessary.

If a spill does occur, the amount of solvent in the containers is a quantity which can be collected with sorbent clay or pads. Any contaminated soil that results will be removed manually, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

3.4.2 Potential Major Spill Sources

The following activities have the potential for a major (one for which remedial action will require assistance) pollution incident:

- a. Overfilling of storage tanks--Both product and spent solvent tanks can be overfilled with a resulting discharge of solvent. A high level alarm and daily checks of tank volumes will prevent this type of incident.

- b. Leaking pipelines--The pipelines and other equipment present a potential for leaks and resultant pollution. Regular inspection of this equipment and the solvent inventory will detect any leaks.

3.4.3 Potential Fire Sources

The following is a list of fire prevention and minimization measures:

- a. All wastes and products are kept away from ignitable sources--
Personnel must confine smoking and open flames to remote areas, separate from any solvent (e.g., the office or locker room).
The mineral spirits handling area and the aboveground storage tanks are separated from the warehouse building area to minimize the potential for a fire to spread or injury to personnel to occur.
- b. Ignitable wastes are handled so that they do not:
 - 1. become subject to extreme heat or pressure, fire or explosion, or a violent reaction--The mineral spirits waste is stored in a tank or in drums, none of which are near sources of extreme heat, fire, potential explosion sources or subject to violent reactions. The tanks are vented and the drums kept at room temperature to minimize the potential for pressure build up.

2. produce uncontrolled toxic mists, fumes, dusts or gases in quantities sufficient to threaten human health--The vapor pressure of mineral spirits is low (2 mm) and it is reactive with strong oxidizers only. Toxic mists, fumes, dusts or gases will not form in quantities sufficient to threaten human health since strong oxidizers are not handled at this facility and the solvent vaporization will be minimal under normal working conditions.
3. produce uncontrolled fires or gases in quantities sufficient to pose a risk of fire or explosion--See 'a' above and 'c' below.
4. damage the structural integrity of the Safety-Kleen facility--The mineral spirits will not cause deterioration of the tank, drums or other structural components of the facility.
- c. Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, and decontamination equipment to any area of the facility operation in an emergency.
- d. "No Smoking" signs are posted in areas where solvents are handled or stored.

- e. Fire extinguishers must be checked once per month and tested by the fire extinguisher company once per year.

3.4.4 Tank Evaluation and Repair Plan

The material stored in the tanks at this facility are petroleum based and are compatible with the carbon steel structure; in fact, petroleum based materials are often used as a coating to prevent rusting of metal parts.

If corrosion is noted, it will be removed and the tank repaired. If corrosion is significant and localized, the tank will be immediately taken out of service and repaired, (e.g., a patch welded over the corroded area). Should the corrosion of the vessel be extensive or if the tank is found to be leaking, the vessel will be immediately taken out of service and replaced. In the case of a tank which leaks outside of the dike, the facility's contingency plan will be initiated to insure the removal of any contaminated soil.

3.4.5 External Factors

The design of the installation is such that a harmful spill is highly unlikely to occur from most external factors. The storage tanks are inaccessible to non-Safety-Kleen personnel and the pump switches are located inside. Also, the drum storage area in the building is inaccessible to unauthorized personnel.

- a. Vandalism - Only extreme vandalism would result in a solvent spill or fire. Responses to spills and fires are described in the contingency plan.
- b. Strikes - A strike would not result in a solvent spill or fire.
- c. Power failure - A power failure would not result in a spill or fire. Should a power failure occur, all activities requiring electricity will cease.
- d. Flooding - The site elevation is above the projected 100-year flood plain; therefore, a 100-year flood will not affect the facility.
- e. Storms or Cold Weather - The solvent return and fill station is roofed to eliminate the possibility of rain or snow entering the dumpsters. No opportunity is foreseen to affect the facility with snow, cold weather or storm water.

3.5 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEMS

Internal communication within the building and the solvent return/fill area is accomplished by voice and intercom. Telephones will be used to report a spill or a fire and to summon assistance from local and state emergency response agencies. Service center and accumulation center

managers have emergency phone numbers of local and state emergency response teams posted by each phone located in the sales office. Included in these phone numbers is the 24-hour telephone number which can be used to contact the Environmental Affairs Department.

CONTINGENCY PLAN

ABSTRACT

PURPOSE: This plan describes the proper action to be taken by employees during an emergency.

RESPONSIBILITIES: The emergency coordinator or his alternate is responsible for implementing the plan during an emergency.

EMERGENCY COORDINATOR: The branch manager is the emergency coordinator. The alternate emergency coordinator is the branch secretary.

EMERGENCY NOTIFICATIONS:

South Plainfield Police Department	201/755-0700
South Plainfield Fire Department	201/756-4700
Muhlenberg Hospital	201/668-2000
Environmental Affairs Dept.	312/888-4660
New Jersey Department of Environmental Protection	609/282-7172
Lionetti Oil Recovery, Inc.	201/721-0900

4.0 CONTINGENCY PLAN

Safety-Kleen Corp. (2-118-04)
Skyline Drive
South Plainfield, New Jersey 07080

4.1 PURPOSE

The contingency plan describes the actions to be taken by each employee in the event of a spill, fire or other emergency. It includes the information necessary to address emergency situations efficiently and in such a manner as to prevent or minimize hazards to human health or the environment due to fire, explosion, or any other release of hazardous materials to the air, soil, surface water, or ground water.

The contingency plan is to be carried out immediately whenever there is a release of hazardous material which could threaten human health or the environment, implementing the procedures contained in this plan.

4.2 EMERGENCY COORDINATOR RESPONSIBILITIES

The emergency coordinator is responsible for implementing the contingency plan during an emergency; however, all employees must be familiar with the procedures in this plan and are responsible for proper implementation of the plan should the emergency coordinator or his

alternate be unavailable. The branch manager is the emergency coordinator and the branch secretary is the alternate emergency coordinator.

The emergency coordinator and his alternate must be familiar with all aspects of this contingency plan, the operations and activities at the facility, the location and characteristics of materials handled, the location of all records within the facility and the facility layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. Their home addresses and telephone numbers, as well as the office telephone number, are listed in Appendix F. Also listed in Appendix F are the assigned duties of each employee during an emergency. At least one employee will be at the facility or on call to respond to an emergency situation.

4.2.1 Responsibilities During an Emergency

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his alternate when the emergency coordinator is not available) must immediately:

- a. activate the internal facility communication system to notify all facility personnel;
- b. notify Safety-Kleen's Environmental Affairs Department using the 24-hour telephone number after working hours - 312/888-4660; and

- c. notify appropriate state or local agencies with designated response roles, if necessary.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately try to identify the character, exact source, amount, and extent of any contamination. Because of the limited number of materials being handled at the facility, he or she may do this by observation or by review of facility records. If necessary, outside laboratories may be contacted to perform chemical analysis.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous run-off).

During an emergency, the emergency coordinator must take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

4.2.2 Remedial Action Responsibilities

If the environment has been contaminated or there is a potential for contamination as a result of a fire, explosion, or spill, the emergency coordinator must contact the Environmental Affairs Department to report the incident. The treatment, storage and/or disposal of the recovered waste, contaminated soil or surface water that results must be arranged by Safety-Kleen and carried out as expeditiously as possible.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

- a. no substance that may be incompatible with the released material is brought on site until cleanup procedures are completed; and
- b. all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

4.2.3 Reporting Responsibilities

If the emergency coordinator determines that the facility has had a release that could threaten human health or the environment, the coordinator must report those findings as follows:

- a. If the assessment indicates that evacuation of local areas may be advisable, the coordinator must immediately notify appropriate authorities.
- b. The coordinator must immediately notify the Environmental Affairs Department. The department will report the incident to the New Jersey Department of Environmental Protection, including the:

- (1) name and telephone number of notifier;
- (2) name and address of facility;
- (3) time and type of incident (e.g., release, fire);
- (4) name and quantity of material(s) involved, to the extent known;
- (5) the extent of injuries, if any; and
- (6) the possible hazards to human health, or the environment outside the facility.

Safety-Kleen will notify the appropriate state and local authorities that the facility is in compliance with section 4.2.2 before operations are resumed in the affected area(s) of the facility.

The emergency coordinator must document the time, date, and details of any incident that requires the implementation of the contingency plan. Within 60 days of the incident, Safety-Kleen will submit a written report

on the incident to the New Jersey Department of Environmental Protection.

The report must include:

- a. name, address, and telephone number of the owner or operator;
- b. name, address, and telephone number of the facility;
- c. date, time, and type of incident (e.g., fire, explosion);
- d. name and quantity of material(s) involved;
- e. the extent of injuries, if any;
- f. an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. estimated quantity and disposition of recovered material that results from the incident.

4.2.4 Chain of Command

Based on the emergency response procedures described above, the chain of command during an emergency is as follows:

- a. The person who discovers/causes the spill reports to the emergency coordinator.

- b. The emergency coordinator contacts the Environmental Affairs Dept.
- c. The Environmental Affairs Department reports to the New Jersey Department of Environmental Protection.

4.2.5 Government Agencies and Local Authorities to Be Notified

During an emergency, the following government agencies and local authorities may be contacted:

<u>Agency or Authority</u>	<u>Rationale</u>
Police Department	Notify if there is imminent danger to human health.
Fire Department	Notify if there is a fire, uncontrolled spill, or other imminent danger.
Hospital	Notify if there are any injuries.
New Jersey Department of Environmental Protection	Report releases and fires.
Lionetti Oil Recovery, Inc.	Call to assist with remedial action after a release.

Arrangements have been made to familiarize the police department, fire department and local emergency response teams with the layout of the facility, the properties of hazardous materials handled and associated hazards, locations where facility personnel normally work, entrances to and

roads inside the facility, and possible evacuation routes. Arrangements have also been made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. Copies of the letters to the local police department, fire department and hospital are in Appendix F.

4.3 EMERGENCY RESPONSE PROCEDURES

Response actions to be taken in specific emergency situations are described in the sections which follow.

4.3.1 Minor Spills

If a spill should occur while pouring spent solvent into a dumpster or filling drums with solvent product at the return and fill station, and it is contained in the secondary containment at the base of the return and fill station, remedial action will not be necessary. Should the spill occur outside the containment, different actions must be taken depending on whether the spill occurs on a paved or unpaved area:

- a. If the solvent spills on a paved area, it must be collected with sorbent sheets and/or sorbent clay (such as "Oil Dry"). The sorbents will be collected, drummed and shipped to the Safety-Kleen recycle center for proper disposal.

- b. If the solvent spills on an unpaved area, the free solvent must be collected with sorbent material. The sorbent material and any contaminated soil must be collected, drummed and shipped to a Safety-Kleen recycle center for proper disposal.

If a spill occurs while moving or delivering drums outside of the warehouse, the response actions described in 'a' and 'b' above must be followed. Spills inside the warehouse and the paint waste shelter will be prevented from contaminating the environment by the concrete floor and the secondary containment. In the event of a spill indoors, the doors and windows should be opened to improve the ventilation in the confined area. If solvent is spilled in a non-explosion rated area or is flowing in such, insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions of the appropriate Material Safety Data Sheet (Appendix F, Corporate Policy 600-608), the worker will enter the area wearing rubber gloves, aprons, safety glasses, and/or a respirator, collect the liquid, drum it and return it to storage.

Cleanups are completed only when the workers have cleaned themselves and the emergency equipment with soap and water. All minor spills must be reported to the Environmental Affairs Department and the department will contact the New Jersey Department of Environmental Protection, if required.

4.3.2 Major Spills

Any spill which can not be completely remediated using the methods described in 'a' and 'b' of section 4.3.1 is a major spill. A major spill is usually the result of a vehicular accident, tank overfilling, equipment failure or a fire. Spilled material which escapes collection can contaminate soil, surface water, ground water, sanitary sewer systems and storm sewer systems. Emergency response to this type of spill should be as follows:

- a. Assist any injured people.
- b. Stop the flow of solvent, if possible.
- c. Retain, contain or slow the flow of the solvent if it can not be stopped.
- d. If solvent escapes your containment efforts, immediately call the local Fire Department, and report to the emergency coordinator and the Environmental Affairs Department.
- e. Immediately recover the spilled solvent to reduce property and environmental damage. Start recovery operations immediately.

The emergency coordinator shall report any incident as soon as possible to the Environmental Affairs Department using the 24-hour

telephone number: 312/888-4660. If the Environmental Affairs Department does not respond within thirty minutes, the emergency coordinator shall call an emergency cleanup response contractor, if it is deemed necessary, and report the incident to the National Response Center (telephone: 800/424-8802) and New Jersey Department of Environmental Protection (telephone: 606/292-7172 - 24 hour number). Otherwise, the Environmental Affairs Department will contact the proper authorities.

The person reporting a spill should be prepared to give his name, position, company name, address and telephone number. The person reporting should also describe the material spilled and, if possible, some estimate of the amount, and the containment status and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills, will usually be disposed of at a properly permitted treatment or disposal facility since the quantity of waste material will probably exceed the storage capacity of the Safety-Kleen recycle center.

Every spill must be recorded on the Spill Report Telephone Log (Appendix F) and reviewed with branch personnel to prevent similar spills from occurring in the future. A copy of this report is sent to the Environmental Affairs Department.

4.3.3 Fire Control Procedures

If a fire occurs, personnel must act quickly with the fire

extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuate the facility and call the fire department.

Vapors of mineral spirits exposed to a spark or open flame can flash at temperatures over 105° F. A mineral spirits fire can best be extinguished with foam. If foam is not available, sweeping the fire with water fog can cool it, directing the water spray to push the flames into a confined area, if possible. The flame should not be extinguished until the flow of the solvent has been stopped. Then attention should be directed immediately to extinguishing the flame.

Immersion cleaner (which is a mixture of chlorinated solvents, cresylic acid and an alkaline solution), and halogenated solvents are not flammable, but can produce phosgene gas and hydrochloric acid at very high temperatures (about 1200° F). The potential for the materials reaching a decomposition state is minimal; however, branch personnel and local authorities must be aware of the proper response, should a fire affect the drum storage areas:

- a. Isolate the hazard area and deny entry to unauthorized personnel.
- b. Stay upwind; keep out of low areas.
- c. Ventilate closed spaces before entering them.

- d. Wear positive pressure breathing apparatus and protective clothing.
- e. Evacuate a 600 foot radius area endangered by the gas.

A fire in the drum storage area can best be extinguished by foam, water fog, or water spray.

Paint wastes can generate carbon monoxide and other poisonous gases. Therefore, it is important to wear positive pressure breathing apparatus and full protective clothing in the affected area. If a fire in or near the paint waste storage area in the warehouse occurs:

- a. Isolate the area and deny entry to unauthorized personnel.
- b. Stay upwind; keep away from low areas.
- c. Wear protective clothing and self-contained breathing apparatus.

A dry chemical, carbon dioxide or foam will best extinguish the fire. Cool the shelter and containers with water until well after the fire has been extinguished.

4.4 EVACUATION PLAN

Clearly marked exits exist in the warehouse and office area and employees are trained to be aware of all potential escape routes.

When an uncontrolled fire or release has occurred, all personnel are to be evacuated from the area and assemble across Skyline Drive to assure that all personnel are accounted for and out of the hazardous area. The fire department must be notified at the time of evacuation either from a safe on-site building or from a neighboring facility.

4.5 ARRANGEMENT WITH EMERGENCY RESPONSE CONTRACTORS

An emergency response contractor is identified on the Emergency Information sheet (Appendix F). This contractor will provide emergency assistance during a release and/or cleanup.

4.6 POLLUTION INCIDENT HISTORY

There are no records of a pollution incident having occurred at this facility.

4.7 IMPLEMENTATION SCHEDULE

Any discrepancies or deficiencies found during the routine inspection must be corrected expeditiously to insure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or an accident has already occurred, remedial action must be taken immediately. The branch or accumulation center manager has the overall responsibility for remediating any discrepancies found during the routine inspection, and

will consult with the corporate environmental and engineering staffs to design an implementation schedule for remedial action.

4.8 AVAILABILITY AND REVISION OF THE CONTINGENCY PLAN

This plan and all revisions to the plan are kept at the facility and regularly updated throughout the operating life of the facility. Copies of this document are provided to local authorities and organizations listed on the Emergency Information sheet (Appendix F) and they may be called upon to provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the facility.

The plan is reviewed and updated, if necessary, whenever:

- a. the facility license is modified to allow new process wastes to be stored or treated, or applicable regulations are revised;
- b. the list or location of emergency equipment changes;
- c. the facility changes in its design, construction, operation maintenance, or other circumstances in a way that:
 - (1) increases the potential for fires, explosions, or releases of hazardous constituents, or

- (2) changes the response necessary in an emergency;
- d. the names, addresses, or phone numbers of emergency coordinators change;
- e. the employee assigned to each emergency task changes; or
- f. the plan fails when implemented in an emergency.

PERSONNEL TRAINING

ABSTRACT

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

JOB TITLE	Prior to Starting Work	On the Job	Annually	When Regulations and/or Procedures Change
Regional Manager			X	X
Branch Manager	X		X	X
Branch Secretary		X	X	X
Sales Representative	X	X	X	X
Warehouseman		X	X	X
Accumulation Center Manager	X		X	X
Accumulation Center Driver		X	X	X

5.0 PERSONNEL TRAINING

5.1 OUTLINE OF TRAINING PROGRAM

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his job assignment. New branch managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Appendix G contains information on service center personnel and trainers, job descriptions, training outlines and training record forms.

5.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

Environmental compliance and training of branch employees is the responsibility of the branch manager. It is the responsibility of his regional manager to insure that the branch manager is trained and that he trains all branch personnel. The Environmental Affairs Department, in turns, train all regional managers annually. Job descriptions for branch personnel are in Appendix G.

5.2.1 Branch Manager

The branch manager is ultimately responsible for the operations at the service center. The sales representatives, secretary and warehouseman report to him and he, in turn, must provide the training and materials

necessary for them to execute their duties. With respect to environmental compliance, he must:

- a. keep the service center clean and orderly;
- b. execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- c. know the potential hazards of the material and wastes handled on site;
- d. identify potential spill and fire sources and be able to execute the contingency plan;
- e. inform all employees of their environmental responsibilities;
- f. notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- g. maintain all environmental records (such as manifests, training records and spill reports) at the service center.

5.2.2 Regional Manager

The regional manager oversees the operations of several (six to eight) service centers in a geographic area. Branch managers report to him and he, in turn, must verify that the branch managers are operating their facilities in compliance with environmental regulations as well as Safety-

Kleen's internal standards. With respect to environmental compliance, he must:

- a. perform a quarterly inspection of each branch in his region to review recordkeeping and maintenance practices;
- b. conduct an annual training session for branch managers and secretaries;
- c. insure that the branch manager is training branch employees;
- d. make certain that the contingency plan and remedial actions have been properly executed for any emergencies; and
- e. assume the responsibilities of the branch operations in the absence of the branch manager.

5.2.3 Accumulation Center Manager

The accumulation center manager is ultimately responsible for the operation of the accumulation center. The driver reports to him and he, in turn, must insure that he and his employee are trained to properly execute their duties. With respect to environmental compliance, he must:

- a. keep the accumulation center clean and orderly;
- b. execute or designate an employee to execute the daily

inspection, keep a written log and remediate any problems;

- c. know the potential hazards of the material and wastes handled on site;
- d. identify potential spill and fire sources and be able to execute the contingency plan;
- e. inform his employee(s) of his (their) environmental responsibilities
- f. notify the environmental coordinator during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office; and
- g. maintain all environmental records (such as manifests, training records and spill reports) at the accumulation center.

5.2.4 Environmental Affairs Department

Safety-Kleen's Environmental Affairs Department operates out of the corporate office in Elgin, Illinois. Each regional engineer manages the training, permits and other compliance issues for the branches in a geographic area of the country. The Department must:

- a. execute training of the regional managers in accordance with environmental regulations and corporate policy;

- b. notify the proper authorities, oversee remedial actions and submit a written report to the state after an emergency situation has occurred;
- c. assure that environmental permits are submitted and updated as required; and
- d. manage any environmental compliance issues which exceed the resources available at the branch or regional level.

5.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training is accomplished using both classroom and on-the-job methods. The Environmental Affairs Department trains the regional managers, and each regional manager, in turn, trains his branch managers and secretaries.

An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and annually thereafter. Regional managers are never new employees in that they are promoted from within the company. Training program outlines are in Appendix G.

5.3.1 Training of New Branch and Accumulation Center Managers

New branch managers are trained for twelve weeks before they begin their new positions. This training is both in situ and classroom modes. While being trained at a designated "training branch", the new branch manager reviews all environmental records and learns the recordkeeping requirements for each. These records include: manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates in two weeks of classroom training, one day of which is devoted to environmental compliance. Six hours consists of an introduction to environmental law and a review of the Part A, Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. This training is outlined in Appendix G.

An additional one and a half hours is spent with the environmental engineer responsible for permits and compliance in the branch manager's state. Regulations unique to that state are discussed as well as the results of any past state inspections and other compliance issues.

Similarly, the new accumulation center manager's training culminates in classroom training, one day of which is devoted to environmental compliance. This training is the same as that given to new branch managers.

5.3.2 Training of New Branch Secretaries

Branch secretaries are trained in the proper recordkeeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process or file it as required. Additional training is overseen by the branch manager and is done within six months of starting. It includes the items listed in the Training Plan Outline (Appendix G) which are explained in company-produced slide/tape presentations on emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues. In addition, the contingency plan and Corporate Policies 600-608, 609 and 610 (Appendix F) are reviewed with new employees and the policies are posted in the office. The contingency plan must be reviewed with the branch manager within the first two weeks of the secretary starting work.

5.3.3 Training of New Sales Representatives

New sales representatives are trained in situ for two weeks during which they are introduced to manifests, facility inspection records and training records. A sales representative may also be trained as the designate for performing the facility inspection. Additional training is in the form of slide/tape presentations, a review of the contingency plan and Corporate Policies 600-608, 609 and 610. The contingency plan must be reviewed with the branch manager before the sales representative formally

begins his new position. All items listed in the Training Plan Outline for Branch Employees must be explained within six months of starting.

5.3.4 Training of New Warehousemen

A warehouseman is trained to maintain the service center and assist the other branch employees in their tasks. He may be a designate for the facility inspection and must be trained by the branch manager as such. Within two weeks of the warehouseman's starting, the branch manager must review the contingency plan with him, and within six months he must review the items listed in the Training Plan Outline for Branch Employees.

5.3.5 Annual Training

On an annual basis, regional managers are trained by the Environmental Affairs Department in a two-day session which concludes with a certification test (Appendix G). The regional managers must execute the same training session for their branch personnel on an annual basis. The class includes updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

All branch employees must annually review the items listed in the Training Plan Outline for Branch Employees. This review is in the form of slide/tape presentations, review and discussion of the storage facility permit application and Corporate Policies 600-608, 609 and 610. In addition, periodic memoranda on changes in environmental regulations are

issued by the Environmental Affairs Department and must be read and discussed by all regional, branch and accumulation center personnel.

5.4 TRAINING RECORDS

All training must be documented using the record forms in Appendix G. The records must be kept on file at the facility until closure.

CLOSURE PLAN

ABSTRACT

LOCATION ADDRESS: Safety-Kleen Corp. (2-118-04)
Skyline Drive
South Plainfield, New Jersey 07080

U.S. EPA I.D. NO: NJD 982270506

WASTE UNITS TO UNDERGO CLOSURE:

- a. Tank Storage - one 15,000 gallon aboveground storage tank and one 8,000 gallon tank used for secondary containment. In addition, one 15,000-gallon tank is used for waste oil storage.
- b. Drum Storage - an area of about 3,840 square feet at the service center and one area of about 8,000 square feet at the accumulation center. A maximum of 76,032 gallons (1,257 55-gallon and 432 16-gallon drums*) can be stored.
- c. Return and Fill Station - The location of this waste management unit is shown in the Site Plan. The dumpsters hold a maximum of 672 gallons of waste.

* Materials may be stored in 55-, 16- and 5-gallon containers or in lined boxes. The above figures represent maximum storage capacities and numbers of drums.

6.0 CLOSURE PLAN

6.1 PURPOSE

The South Plainfield service center operates as a storage facility for hazardous wastes, and Safety-Kleen believes it is required that it be closed in accordance with the closure requirements of N.J.A.C. 7:26-9.8. Closure of the facility will be carried out in accordance with the steps outlined in this plan and Appendix H contains an estimated schedule and cost for the completion of closure. Safety-Kleen will remove all hazardous wastes and residuals from the facility and will therefore eliminate the need for further maintenance and care. This facility does not have a finite capacity which can be depleted. Therefore, closure is anticipated to occur after the year 2000.

6.2 ABOVEGROUND TANKS AND ASSOCIATED PIPING

To safely clean and decommission the aboveground storage tanks and the aboveground secondary containment tank:

- a. Remove the remaining material from each tank and ship the materials to a reclaimer for reclamation.

- b. Provide access to each tank.
- c. Rinse, scrape and squeegee each tank interior, removing all residual waste material and rinsate.
- d. Disconnect and decontaminate all appurtenant piping and pumping equipment.
- e. Remove tanks and appurtenant equipment and reuse or sell as scrap.
- f. Clean and raze the diking and slabs.
- g. Backfill all excavations with clean fill materials.
- h. Transport and dispose of all waste material generated during the project.

6.2.1 Removal of Waste Material and Opening of the Tanks

The contents of the tanks must be removed using a pump, vacuum or similar equipment and then be shipped by tanker truck to a reclaimer.

To gain access to aboveground tanks, use the manway at the top of the tank. Depending on the type of opening and the condition of the equipment, a variety of tools may be used to open the manway. Care must be exercised to minimize spark generation when working on the tank.

Prior to entering each tank, personnel should have full face respiratory protection and protective clothing. Once the tanks have been opened, they must be provided with positive ventilation. The tanks will then be inspected to determine the approximate quantity and physical conditions of any remaining waste material.

6.2.2 Removal of Residual Waste and Cleaning of Tanks

Before removing any residual waste from either tank, all piping and appurtenant equipment will be flushed with clean mineral spirits followed by a detergent solution.

The method used to remove the residual waste material from the tanks will depend on the physical properties and quantities of that material. Prior to any person entering the tank, an effort will be made to remove as much liquid and sediment as possible (see section 6.2.1).

Subsequent to vacuuming the majority of the material from the tanks, it may be necessary to use a high pressure wash system using clean solvent and a detergent solution to rinse residual material from the walls, roof, and floor of the tank. The evacuated material and the rinse solution will be shipped to a reclaimer. The quantity of wash fluid used will be kept to a minimum in order to limit the amount of waste material.

Storage tanks are considered confined spaces (i.e. spaces open or closed having a limited means of egress in which poisonous gases or

flammable vapors might accumulate or an oxygen deficiency might occur), and confined space entry requires special procedures:

- a. Tanks are to be washed, neutralized and/or purged (where flammable atmosphere is present) prior to being entered.
- b. Supply valves must be closed and tagged and bleeder valves left open; or supply piping should be disconnected.
- c. Pumps or motors normally activated by automatic controls shall be operated manually to be sure they have been disconnected. Instrument power switches should be tagged "Off".
- d. On tanks where flammable vapors may be present, all sources of ignition must be removed.
- e. Under circumstances where "hot work" (welding, burning, grinding, etc.) is to be performed in or on the vessel, a test for combustible gases shall be taken. This is referred to as a "flash test". In all tank entering situations, an oxygen deficiency test shall also be performed prior to tank entry. Both flash test and oxygen deficiency test will be performed by the supervisor of the area in which the work is being done.
- f. Under conditions where there exists a possibility (no matter how remote) of toxic vapors being present in the tank to be

entered, the supervisor will arrange to have the air tested.

The results of all tests will be displayed on site.

- g. There must be a set of wristlets or a rescue harness and sufficient rope at the job site to effect a rescue. Any other rescue equipment considered necessary must also be on the job site.
- h. Workers should wear rescue harnesses if entering a tank with a large enough opening to easily affect a rescue. In tanks with small openings, only wristlets may be used. In cases where there are agitator shafts, drums or other hazards in which the man's life-line would be entangled and the supervisor in charge feels that wearing the lifeline may entrap a man and increase the hazard, the wearing of a harness or wristlets may be eliminated.
- i. A constant source of fresh air must be provided to insure a complete change of air every few minutes. In cases of short term entry for inspection or removal of objects, an air mask is recommended. In cases of long term entry the use of an air mover should be considered.
- j. When a ladder is required to enter a tank, the ladder must be secured and not removed while anyone is in the vessel. In

cases where a rigid ladder could become an obstacle, a chain ladder may be used.

- k. Adequate illumination must be provided and a flashlight or other battery operated light must also be on hand to provide illumination for a safe exit in the event of an electrical power failure.
- l. All electrical equipment to be used inside a tank must be in good repair and grounded.
- m. Other people working in the immediate area will be informed of the work being done, and they must inform the watcher or supervisor immediately of any unusual occurrence which makes it necessary to evacuate the tank.
- n. The Watcher or Standby Observer System must be implemented. It consists of the following:
 - (1). Workers inside a confined space must be under the constant observation of a fully instructed watcher.
 - (2). Before anyone enters the tank, the watcher will be instructed by the person in charge of the entry that an entry authorization must be obtained from the person in charge and a rescue harness or wristlets must be used on

the job.

- (3). The watcher must also know the location of the nearest telephone (with emergency numbers posted), eyewash and/or shower, fire extinguisher and oxygen inhalator. For all "hot work" inside a tank, the watcher must be instructed how to shut down the welding/burning equipment.
 - (4). As long as anyone is inside the vessel, the watcher must remain in continuous contact with the worker. HE IS NOT TO LEAVE THE JOB SITE EXCEPT TO REPORT AN EMERGENCY. He does not enter the tank until help is available.
 - (5). After being instructed in his responsibilities, the watcher will sign a form indicating his understanding.
- o. All welding and burning equipment must be provided with a shutoff under the control of the watcher; and the watcher must be shown how to shut off the equipment if it becomes necessary. Welding and burning equipment will only be taken into a tank immediately prior to its use and must be removed from the tank immediately after the job is finished.
 - p. For all "hot work" inside a tank, a properly executed flame permit, if needed, must be displayed at the job site and

standard welding and burning safety precautions will always be followed.

6.2.3 Removal of the Tanks

To safely remove the tanks :

- a. Disconnect all appurtenant piping.
- b. Disconnect all appurtenant pumping equipment.
- c. The vessels shall be removed and reused or cut up and sold as scrap.
- d. Raze the diking and slabs and inspect the excavation. Examine soils using a photoionization detector. If contamination is indicated, confirm with laboratory analyses, determine the extent of contamination with a soil study and overexcavate soils down to clean soils.
- e. Backfill the excavation with clean fill materials and grade to ground level.

6.3 DRUM STORAGE AREAS

The drum storage areas are used for the storage of drums of used immersion cleaner, halogenated solvents, dumpster sediment and paint wastes. At closure, all the drums will be removed and transported to a reclaimer after proper packaging, labeling and manifesting. The contents of the drums will be reclaimed and the drums will be cleaned for reuse.

The concrete floor and spill containment sumps will be cleaned with a detergent solution and the cleaned area will be inspected, using a photoionization detector, to determine the completeness of the cleaning. Any other wastes generated in the closure process will be reclaimed or properly disposed of.

6.4 SOLVENT RETURN AND FILL STATION

The return and fill station is used to collect and return the used mineral spirits to the waste storage tank. Closure of the return and fill station will be made prior to the cleaning and removal of the storage tank. At closure, the sediment in the dumpsters will be removed and drummed, labeled, and manifested and then shipped to a reclaimer.

The dumpster and the dock area will be thoroughly rinsed with a detergent solution. The rinsate is discharged through the appurtenant piping system into the storage tank, which will be subjected to a separate

closure procedure as described earlier. The clean dumpster and dock structure will be reused by Safety-Kleen or scrapped.

6.5 FACILITY CLOSURE SCHEDULE AND CERTIFICATION

Within 90 days of receiving the final volume of hazardous wastes, Safety-Kleen will remove all hazardous wastes from the site in accordance with the approved closure plan. The New Jersey Department of Environmental Protection may approve a longer period if Safety-Kleen demonstrates that the activities required to comply with this paragraph will, of necessity, take longer than 90 days to complete or the following requirements are met:

- a. the facility has the capacity to receive additional wastes;
- b. there is a likelihood that a person other than Safety-Kleen will recommence operation of the site; and/or
- c. closure of the facility is incompatible with continued operation of the site. In this case, Safety-Kleen will take all steps necessary to prevent threats to human health and the environment.

Safety-Kleen will complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes.

When closure is completed, Safety-Kleen shall submit to the New Jersey Department of Environmental Protection certification, both by the operator and by an independent registered professional engineer, that the facility has been closed in accordance with the approved closure plan.

EMERGENCY INFORMATION

A. Facility Emergency Coordinator

Name: Tony Consalvo
Home Address: 39 Fulton Ave.
Bridgewater, NJ 08876
Telephone: Office: 201/356-2229
Home: 201/722-4381

Alternate Coordinator

Linda Balicki
237 W. High St.
Boundbrook, NJ 08805
201/356-2229
201/271-8328

B. Emergency Notification Phone Number

a. Internal :

Safety-Kleen Environmental Engineering Department
24 Hour Emergency Number: 312/888-4660

b. External :

1. National Response Center
24 Hour Emergency Number: 800/424-8802
2. New Jersey Department of Environmental Protection
24 hour emergency number: 609/292-7172

C. Emergency Team to be Notified

	UNIT	TELEPHONE NUMBER
a.	South Plainfield Fire Dept.	201/756-4700
b.	South Plainfield Police Dept.	201/755-0700
c.	Muhlenberg Hospital	201/668-2000
d.	Lionetti Oil Recovery, Inc.	201/721-0900

EMPLOYEES' FUNCTIONS DURING AN EMERGENCY

<u>Employee</u>	<u>Title</u>	<u>Emergency Function</u>
Tony Consalvo	Branch Manager	Emergency Coordinator Notify Environmental Engineering Department Apply First Aid Notify Emergency Agencies, if necessary.
Linda Balicki	Branch Secretary	Alternate Emergency Coordinator
Joanne DeMaio	" "	Supervise Evacuation
Randy Barney	Sales Representative	Retain, contain or slow the flow of solvent Shut off electricity
Jim Limbach	" "	
Ron Jenkins	" "	
Brian O'Leary	" "	
Joe Palumbo	" "	
Byron Slater	" "	
William Ulman	" "	
Robert Killough	" "	
Paul Mundy	" "	
Steve Puff	" "	
Joe Baker	" "	
Mike Ford	" "	
Kevin Coman	" "	
Scott Tabler	" "	
Eugene Pastrick	" "	
Curtis Smith	Warehouseman	
*	Accumulation Center Manager	
*	Accumulation Center Driver	

* This position has not yet been filled.

LIST OF BRANCH EMPLOYEES

<u>EMPLOYEE</u>	<u>POSITION</u>
Tony Consalvo	Branch Manager
Linda Balicki	Branch Secretary
Joanne DeMaio	Branch Secretary
Randy Barnes	Sales Representative
Jim Limback	" "
Ron Jenkins	" "
Brian O'Leary	" "
Joe Palumbo	" "
Joe Baker	" "
Byron Slater	" "
William Ulman	" "
Mike Ford	" "
Robert Killough	" "
Kevin Coman	" "
Paul Mundy	" "
Steve Puff	" "
Scott Tabler	" "
Eugene Pastrick	
Curtis Smith	Warehouseman
*	Accumulation Center Manager
*	Accumulation Center Driver

* This position has not yet been filled

SOUTH PLAINFIELD, NEW JERSEY FACILITY
CLOSURE COST ESTIMATE

1. Tank Closure - Open, remove contents of, clean, remove, and dispose of two 15,000-gallon aboveground storage tanks.

Phase I - Remove Contents and Clean

1. Ship contents to a reclaimer.

Crew:

4 Truck Dr. \$17.56/hr. x 4 hrs. = \$ 280.96

4 Trucks \$1,000 lump sum 1,000.00

Tank size (2 tanks) = 15,000 gal. - 7,500 gal/truck = 4 trucks

4 trucks x 30 miles x 1.75/mile = 210.00

Mineral spirits reclamation costs (\$0.30/gal.) = 4,500.00

Waste oil reclamation costs (\$0.20/gal.) = 3,000.00

2. Squeegee Clean Tank

Crew:

1 Foreman \$18.30/hr. x 54 hrs. = 988.20

1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay)
x 54 hrs. = 1,080.00

3. Use of high pressure water for six days 2,400.00

4. Disposal and transportation of Wash Water
(3,900 gallons @ \$0.12/gallon) = 468.00

5. Transportation of wastewater
500 miles x \$1.75/mile = 875.00

Total - Phase I \$14,802.00

Phase II - Remove and Dispose of Tank

1. Disconnect and Remove Appurtenant Equipment

Crew:

3 Foreman \$18.30/hr. x 8 hrs. = \$ 439.20

6 Laborers \$17.00/hr. x 8 hrs. = 816.00

2. Torch Tank

Crew:

3 Foreman \$18.30/hr. x 8 hrs. =	439.20
3 Laborer \$17.00/hr. x 8hrs.	408.00

3. Remove Tank

Crew:

1 Foreman	\$18.30/hr. x 6 hrs. =	109.80
4 Laborers	\$16.80/hr. x 6 hrs. =	403.20
1 Backhoe	\$28.97/hr. x 6 hrs. =	173.82
1 Oiler	\$25.47/hr. x 6 hrs. =	152.82
Equipment	\$200 Lump Sum =	<u>200.00</u>

Total Phase II - \$3,542.00

Phase III - Backkfilling, Regarading, Soil Testing

1. Test for soil contamination

Scan soil with a photoionization detector
(2 hour) = \$ 100.00

2. Regrading

Crew:

2 F.E. Loader	\$27.38/hr. x 2 hr. =	54.76
Equipment	\$ 2.00/c.y. x 20 c.y. =	<u>40.00</u>

Total - Phase III - \$ 195.00

Summary of Closure Cost for Three Tanks:

Phase I =	\$21,766
Phase II =	3,542
Phase III =	<u>195</u>

\$25,503

2. CLOSURE OF DRUM STORAGE AREAS - Remove and return drums to a reclaimer, clean the drum storage areas, and dispose of wash water generated.

a. 4 Truck Dr. \$17.56/hr. x 8 hrs.	\$ 562.00
4 Trucks - \$ 1000 lump sum	1,000.00
Hauling cost = 19 loads x 30 miles x \$1.75/mile =	998.00

b. Clean drum storage areas

Crew:

1 Foreman \$18.30/hr. x 20 hrs. =	366.00
1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 20 hrs. =	400.00

c.	Dispose of wash water 150 gallons x \$0.12/gallon =	18.00
d.	Dispose of used solvents - 1,257 55-gallon drums x \$100/drum + 432 16-gallon drums x \$30/drum =	132,612.00
e.	Testing for contamination 6 samples x \$75.00 each	<u>450.00</u>

Total Drum Closure Cost = \$136,406.00

3. CLOSURE OF RETURN AND FILL STATION - Remove, package and dispose of sediment, clean the dumpster and dock area, remove dumpster and dock structure for reuse or scrap.

a.	1 Truck \$250 lump sum	\$ 250.00
	Hauling Cost = 30 miles x \$1.75/mile	52.50
	1 Truck Dr. \$17.56/hr. x 8 hrs. =	140.48
	Crew:	
	1 Foreman \$18.30/hr. x 4 hrs. =	73.20
	1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 4 hrs. =	80.00
b.	Clean Dumpster and Dock Area	
	Crew:	
	1 Foreman \$18.30/hr. x 16 hrs. =	292.80
	1 Laborer (\$17.00/hr. & \$3.00/hr. hazard pay) x 16 hrs. =	320.00
	Use of high pressure water for one day =	400.00
c.	Disposal of wash water 100 gallons x \$0.12/gallon =	\$ 12.00
d.	Dispose of dumpster mud 50 drums x \$130/drum =	6,500.00
e.	Testing for contamination 4 samples x \$75 each =	300.00
f.	Disassemble, and remove dumpster and dock Crew:	
	1 Foreman \$18.30/hr. x 24 hrs. =	439.20
	2 Laborers \$17.00/hr. x 24 hrs. =	408.00
	Equipment \$ 5.20/hr. x 8 hrs. =	41.60
	1 Truck Dr. \$17.56/hr. x 2 hrs. =	<u>35.12</u>

Total Dock Closure Cost = \$9,345.00

4.	<u>PE CERTIFICATION =</u>	\$ 500.00
5.	<u>TOTAL CLOSURE COST:</u>	
	2 15,000 aboveground storage tanks =	\$ 14,802.00
	Drum storage area =	136,406.00
	Return and fill station =	9,345.00
	P.E. certification =	<u>500.00</u>
	Subtotal	\$161,053.00
	Contingency and administrative cost (20%) =	32,211.00
	Administrative Cost (10%)	<u>16,105.00</u>
	Total	\$209,369.00

